

## **EXHIBIT 30**

**In the Matter Of:**

*In Re Google Antitrust Investigation*

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[REDACTED]

*October 28, 2021*

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15:59 1 THE WITNESS: Okay. With that instruction,  
15:59 2 it was a discussion. We had an early discussion of  
15:59 3 what we would -- how we would proceed with our display  
15:59 4 advertising business in the light of an evolving  
16:00 5 regulatory and privacy landscape.

16:00 6 MR. NAKAMURA: Q. And [REDACTED], to be  
16:00 7 clear, do you have other knowledge regarding what  
16:00 8 Project Sunday is that you are refusing to provide me  
16:00 9 based on the instruction of Mr. Mahr?

16:00 10 A There is a little bit more detail I can  
16:00 11 recall, but that is discussion I've had with Kent  
16:00 12 Walker.

16:00 13 MR. MAHR: So I'll instruct you -- for  
16:00 14 purposes of the record, I will instruct you formally,  
16:00 15 [REDACTED], not to disclose any -- any  
16:00 16 communications you had with Mr. Walker or any other  
16:00 17 counsel concerning these subjects.

16:00 18 MR. NAKAMURA: Q. And to complete the  
16:00 19 record, are you going to follow Mr. Mahr's  
16:00 20 instruction?

16:00 21 A I do plan to follow Mr. Mahr's instruction.

16:00 22 Q Thank you.

16:00 23 And what specific global regulatory inquiries  
16:00 24 did Project Sunday seek to address?

16:00 25 MR. MAHR: I will offer the same instruction,

16:00 1 [REDACTED], not to respond to that question to the  
16:00 2 extent it requires you to reveal attorney-client  
16:00 3 privileged information.

16:01 4 MR. NAKAMURA: Q. [REDACTED], what are the  
16:01 5 names of the global regulatory inquiries that Project  
16:01 6 Sunday sought to address?

16:01 7 A I'm unable to answer that. I'll -- I'm  
16:01 8 following Mr. Mahr's instruction in this case.

16:01 9 MR. NAKAMURA: Mr. Mahr, are you taking the  
16:01 10 position that the names of these specific regulatory  
16:01 11 inquiries are privileged information for which  
16:01 12 [REDACTED] has a right to refuse to answer my  
16:01 13 question?

16:01 14 MR. MAHR: We are.

16:01 15 And I'll say, as I have said before, we are  
16:01 16 working with the Department of Justice to get you  
16:01 17 information on these topics that are not confidential,  
16:01 18 but we're not going to do that on the fly in a  
16:01 19 deposition.

16:01 20 MR. NAKAMURA: Q. Who at Google provided you  
16:01 21 with legal advice regarding Project Sunday,  
16:01 22 [REDACTED]?

16:01 23 MR. MAHR: Again, you can provide the name of  
16:01 24 the lawyers, to the extent you recall.

16:01 25 THE WITNESS: Kent Walker is the one whose

16:01 1 **name I really recall.**

16:01 2 MR. NAKAMURA: Q. And did anyone -- any  
16:02 3 attorneys at any outside law firm provide you with  
16:02 4 legal advice regarding Project Sunday?

16:02 5 **A I don't recall engaging with any outside**  
16:02 6 **attorney on this matter.**

16:02 7 Q Were you one of the Google employees who  
16:02 8 initiated Project Sunday?

16:02 9 **A It's a small group of us that -- including**  
16:02 10 **Kent Walker that said we should look at this question.**

16:02 11 Q Did [REDACTED] also initiate Project  
16:02 12 Sunday?

16:02 13 **A I'm unable to tell you, you know, who exactly**  
16:02 14 **initiated it. But I had discussions with Kent for**  
16:02 15 **sure and a couple of other employees. It's -- it's**  
16:02 16 **not like many people are involved, so I don't know**  
16:03 17 **what to make of initiating versus not.**

16:03 18 Q And were you one of the key decision makers  
16:03 19 on Project Sunday?

16:03 20 **A To my knowledge, there was no decision made.**  
16:03 21 **So -- so I wouldn't call myself or anybody a decision**  
16:03 22 **maker.**

16:03 23 Q When you initiated the project, if there were  
16:03 24 to have been a decision, would you have been one of  
16:03 25 the individuals who would have made a decision as to

16:03 1 any recommendation stemming from Project Sunday?

16:03 2 A I would have been.

16:03 3 Q And who else would have been?

16:03 4 A It would be Kent to -- to look at it from a  
16:03 5 legal aspect, and [REDACTED] and likely Philipp  
16:03 6 Schindler as well.

16:03 7 Q What about Don Harrison?

16:04 8 A I don't recall if he was involved. [REDACTED]  
16:04 9 reports to Philipp. So I -- I would look to Philipp  
16:04 10 as -- as one of the key players.

16:04 11 Q Did you ever discuss Project Sunday with  
16:04 12 Mr. Schindler?

16:04 13 A If we haven't -- yeah, I don't recall. But  
16:04 14 if we discussed it -- if we haven't discussed it, then  
16:04 15 at some point we would have to.

16:04 16 Q Is Project Sunday still an ongoing project?

16:04 17 A To my knowledge, we never terminated it or  
16:04 18 arrived at a definitive outcome. So in that sense,  
16:04 19 it's open. But it's not like it's -- it's something  
16:05 20 we're working on every day. It's open-ended at this  
16:05 21 point.

16:05 22 Q And when was the last meeting you had that  
16:05 23 you can recall regarding Project Sunday?

16:05 24 A I'm having to guess here, but it would be  
16:05 25 over a year ago. That's just a guess.

16:05 1 Q Okay. How many meetings, roughly, did you  
16:05 2 attend regarding Project Sunday?

16:05 3 A A couple.

16:05 4 Q And by "a couple," is that more than five?  
16:05 5 Less than five?

16:05 6 A Less than five is my recollection.

16:05 7 Q Okay. And when did you come to understand  
16:05 8 that your work on Project Sunday was in response to  
16:05 9 global regulatory inquiries?

16:05 10 A Early on in discussions with Kent Walker.

16:05 11 Q Approximately when did you have those early  
16:05 12 discussions with Mr. Walker?

16:05 13 A Oh. As I said earlier, the rough time frame  
16:05 14 is between the beginning of 2019 and, you know, the  
16:06 15 middle -- the second half of 2020. But that's just my  
16:06 16 rough recollection, because beyond that, I don't  
16:06 17 recall.

16:06 18 Q And what role did you have on Project Sunday  
16:06 19 other than -- well, I guess you said you were not a  
16:06 20 key decision maker, which is interesting.

16:06 21 But what -- how would you describe your role  
16:06 22 on Project Sunday?

16:06 23 MR. MAHR: Objection.

16:06 24 I'll instruct [REDACTED] not to respond to  
16:06 25 that question to the extent it requires him to reveal

16:06 1 attorney-client privileged or attorney work product.

16:06 2 **THE WITNESS: Okay.**

16:06 3 MR. NAKAMURA: Q. [REDACTED], I'll ask  
16:06 4 again: How would you describe your role on Project  
16:06 5 Sunday?

16:06 6 **A One of a small group of senior people looking**  
16:06 7 **at various factors at a high level of global trends.**

16:07 8 Q And is there information that you are not  
16:07 9 providing to me or refusing to provide to me based on  
16:07 10 Mr. Mahr's instruction?

16:07 11 **A In regard to which specific question?**

16:07 12 **If you could clarify, I'll answer that.**

16:07 13 Q Do you have any additional knowledge  
16:07 14 regarding your description of the role you played on  
16:07 15 Project Sunday that you are refusing to provide to me  
16:07 16 based on Mr. Mahr's instruction?

16:07 17 **A Not really.**

16:07 18 Q Well, let me just try it this way then: What  
16:07 19 factors did you look at when determining how to  
16:07 20 proceed with Project Sunday?

16:07 21 MR. MAHR: Objection.

16:07 22 I'll instruct the witness not to respond on  
16:07 23 the grounds of privilege and work product protection.

16:07 24 MR. NAKAMURA: Q. And are you going to  
16:07 25 follow Mr. Mahr's instruction?



16:07 1           **A     I am.**

16:07 2           Q     And did you understand the connection to  
16:07 3     global regulatory inquiries to Project Sunday -- I'm  
16:08 4     sorry. Strike that.

16:08 5                 Did you understand there to be a connection  
16:08 6     between global regulatory inquiries and Project Sunday  
16:08 7     when you initiated the project?

16:08 8           MR. MAHR: Objection; asked and answered.

16:08 9                 But you may answer if you're able.

16:08 10          **THE WITNESS: Did I understand -- sorry. If**  
16:08 11 **you could repeat that.**

16:08 12          MR. NAKAMURA: Sure.

16:08 13          Q     Did you understand that Project Sunday was a  
16:08 14     response to global regulatory inquiries at the time  
16:08 15     you initiated the project?

16:08 16          **A     The way I'd describe it, my best description**  
16:08 17 **is, looking across a spectrum of the global**  
16:08 18 **environment ranging from privacy concerns to**  
16:08 19 **regulations, how should we think about the future for**  
16:08 20 **our business? That was really the -- the broad**  
16:08 21 **question we were addressing.**

16:08 22                 It -- it was later that, you know, we got to  
16:09 23     learn about specific regulations. So my point is it's  
16:09 24     not like I understood a lot of regulations, and then  
16:09 25     decided to do anything here.

16:09 1 Q Okay. Who was the day-to-day Google employee  
16:09 2 in charge of Project Sunday?

16:09 3 A [REDACTED] was involved. I'm trying to  
16:09 4 recall whether [REDACTED] was involved. Kent Walker  
16:09 5 and, I believe, Ted Lazarus were also involved.

16:09 6 Q As part of your work on Project Sunday, did  
16:09 7 you ever see any material prepared by the investment  
16:09 8 banking firm Lazard, L-A-Z-A-R-D?

16:09 9 A I don't recall seeing that.

16:10 10 Q Okay. And I want to just confirm these  
16:10 11 things for the record.

16:10 12 Did Google consider any divestitures as part  
16:10 13 of Project Sunday?

16:10 14 MR. MAHR: Same objection not to answer on  
16:10 15 the grounds of attorney-client privilege and attorney  
16:10 16 work product.

16:10 17 MR. NAKAMURA: Q. Will you follow that  
16:10 18 instruction, [REDACTED]?

16:10 19 A I will.

16:10 20 Q Did Google consider any acquisitions as part  
16:10 21 of Project Sunday?

16:10 22 MR. MAHR: Same object- -- same instruction.  
16:10 23 Objection and same instruction. Sorry.

16:10 24 MR. NAKAMURA: Thank you.

16:10 25 Q Will you follow that instruction,

16:31 1 its news content licensing program?

16:31 2 MR. MAHR: You may answer that yes or no.

16:31 3 **THE WITNESS: Not to my knowledge, in any**  
16:31 4 **way.**

16:31 5 MR. NAKAMURA: Okay.

16:31 6 Q And what is Project Metta, M-E-T-T-A?

16:31 7 MR. MAHR: I want to again, if -- if you are  
16:31 8 familiar with that project, renew the instruction that  
16:31 9 you -- you should respond only to the extent that your  
16:31 10 response doesn't require you to divulge  
16:31 11 attorney-client privilege or attorney work product  
16:31 12 information.

16:31 13 **THE WITNESS: I will not be responding to**  
16:31 14 **that question.**

16:31 15 MR. NAKAMURA: Q. Does Project Metta relate  
16:31 16 in any way to Google's display advertising business?

16:31 17 MR. MAHR: You may answer that question yes  
16:31 18 or no.

16:31 19 **THE WITNESS: Tangentially, yes.**

16:31 20 MR. NAKAMURA: Okay.

16:31 21 Q And what is the relationship between  
16:32 22 Project Garamond and Google's display advertising  
16:32 23 business?

16:32 24 MR. MAHR: Objection.

16:32 25 Instruct the witness not to respond on the

basis of the attorney-client privilege and the attorney work product doctrine.

MR. NAKAMURA: Q. Will you follow Mr. Mahr's instruction?

**A I will.**

Q Okay. And did an attorney ever instruct you to prepare any documents or to perform any work as part of Projects Sunday or Monday?

**A I don't recall preparing any documents for Sunday or Monday.**

Q Did -- thank you.

Did an attorney ever instruct you to perform any work other than document-based work as part of Projects Sunday or Monday?

**A May I seek a clarification?**

**Because I don't quite understand the question.**

**If an attorney asks me to come to a meeting, is that performing work?**

Q No.

**A Okay. Good.**

Q That is a good question.

So with that clarification, did an attorney ever instruct you to perform any work other than preparing documents based -- I'm sorry -- as part of

16:33 1 Projects Sunday or Monday?

16:33 2 **A Not that I recall.**

16:33 3 Q And did you instruct any non-attorneys as  
16:33 4 part of Project Sunday to do any work?

16:33 5 **A Me directly?**

16:33 6 Q You directly.

16:33 7 **A I don't believe so.**

16:33 8 Q What about Project Monday?

16:33 9 **A No.**

16:33 10 MR. NAKAMURA: Okay. Those are all the  
16:33 11 questions I have for you. Thank you very much,  
16:33 12 [REDACTED].

16:33 13 Any questions from you, Mr. Mahr?

16:33 14 MR. MAHR: No questions from us.

16:33 15 MR. NAKAMURA: All right.

16:33 16 Well, I appreciate your time today, sir.  
16:33 17 Thank you very much.

16:33 18 Let's go off the record.

16:33 19 **THE WITNESS: Thank you.**

16:33 20 THE VIDEOGRAPHER: The time is 4:33 p.m. We  
16:33 21 are now off the record.

16:34 22 THE REPORTER: I have your standing orders.

16:34 23 Do you need roughs tonight?

16:34 24 MR. MAHR: Yes, we'll take a rough. If  
16:34 25 you're preparing it for the DOJ, we'll take one as

16:34 1 well. Otherwise, we'll take whatever you provide  
16:34 2 tomorrow.

16:34 3 THE REPORTER: You'll get the final tomorrow.

16:35 4 (WHEREUPON, the deposition ended

16:35 5 at 4:33 p.m.)

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